

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DENNIS BERGERON,

CASE NO: 13-cv-10879

JUDGE: Victoria A. Roberts

Plaintiff,

vs.

MOTOR CITY WASTE LIMITED LIABILITY COMPANY,  
JAMES REYNOLDS,  
ROGAN ROLLOFF SERVICE INC., and  
HARRY ROGAN,

Defendants.

GOLD STAR LAW, P.C.  
DAVID A. HARDESTY (P38609)  
CAITLIN E. SHERMAN (P76606)  
Attorney for Plaintiff  
210 E. Third St., Ste. 212  
Royal Oak, MI 48067  
(248) 295-7210  
[dhardesty@goldstarlaw.com](mailto:dhardesty@goldstarlaw.com)  
[csherman@goldstarlaw.com](mailto:csherman@goldstarlaw.com)

PHILLIP STREHLE (P40031)  
Attorney for Defendants  
2878 Orchard Lake Road  
Keego Harbor, MI 48320  
(248) 683-5660  
[phillipstrehle@yahoo.com](mailto:phillipstrehle@yahoo.com)

**OBJECTIONS TO PLAINTIFF'S PRELIMINARY EXPERT LIST**

NOW COME the Defendants, by and through their attorney, Phillip Strehle, and for their Objections states as follows:

1. On June 7, 2013 this Court entered a Scheduling Order requiring that all parties must file their Witness Lists by July 8, 2013.
2. This Scheduling Order required that all Expert Witnesses also be disclosed by July 8, 2013.
3. On July 8, 2013 Plaintiff filed a Preliminary Witness List that did not include any experts.
4. On August 19, 2013 Plaintiff filed a Preliminary Expert Witness List.
5. The filing on August 19, 2013 by Plaintiff is a violation of the Scheduling Order entered by the Court on June 7, 2013.

6. Plaintiff should not be permitted to call any expert witnesses at Trial because he did not comply with the Court's Scheduling Order of June 7, 2013.

**WHEREFORE**, Defendants pray that this Court strike plaintiff's Preliminary Expert Witness List and/or prohibit him from calling any expert witnesses at Trial because he did not comply with the Court's Scheduling Order of June 7, 2013.

Dated: August 20, 2013

Respectfully Submitted,

/S/ Phillip Strehle

Phillip Strehle (P40031)  
Attorney for Defendants  
2878 Orchard Lake Road  
Keego Harbor, MI 48320  
(248) 683-5660

**PROOF OF SERVICE**

The undersigned certifies that the foregoing instrument was served upon all parties and/or Non-Parties to the above cause by depositing a copy thereof in the U.S. Mail, postage prepaid, in an envelope addressed to each of the attorneys of record therein, and the Non-Party itself, at their respective addresses disclosed on the pleadings or otherwise, on the 20th day of August, 2013.

- |                                          |                                |
|------------------------------------------|--------------------------------|
| <input type="checkbox"/> X U.S. Mail     | <input type="checkbox"/> Fax   |
| <input type="checkbox"/> Federal Express | <input type="checkbox"/> UPS   |
| <input type="checkbox"/> Hand Delivered  | <input type="checkbox"/> Other |

/S/ Chelsea Lizzet  
Chelsea Lizzet